

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

MAURA O'NEILL, as administrator of the Estate
of Madelyn E. Linsenmeir,

Plaintiff,

v.

CITY OF SPRINGFIELD, *et al.*

Defendants.

C.A. No. 20-30036-MGM

MOTION FOR LEAVE TO FILE UNDER SEAL
PLAINTIFF'S MOTIONS IN LIMINE

Pursuant to Local Rule 7.2 of the U.S. District Court for the District of Massachusetts, Plaintiff, Maura O'Neill, as administrator of the Estate of Madelyn E. Linsenmeir (the "Plaintiff"), respectfully moves for leave to file under seal Plaintiff's Motions in Limine.

As grounds, Plaintiff states that its Motions in Limine contain information that the parties have designated as confidential under the stipulated protective order entered in this case (Docket No. 64). Plaintiff will submit a redacted version of its Motions in Limine for the public docket. Plaintiff respectfully requests the Court to grant leave to file under seal an unredacted version of the Motions in Limine for the Court's review; Plaintiff will serve this unredacted version on counsel of Defendants for Hampden County Sheriff's Department, Eileen Barrett, and Maureen Couture (collectively, "HCSD"), who assent to this motion for leave to file under seal.

If the Court orders the filing to be sealed, the filing should remain sealed until further order of the Court.

Dated: April 23, 2024

Respectfully submitted,

Plaintiff Estate of Madelyn Linsenmeir,

/s/ Kiman Kaur

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LOCAL RULE 7.1 CERTIFICATE

I hereby certify that counsel for plaintiff conferred with counsel for the HCSD Defendants in a good-faith attempt to resolve or narrow the issues raised in this motion.

/s/ Kiman Kaur

Dated: April 23, 2024

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2024, the foregoing document was served on all counsel of record in the above-captioned matter through the Court's CM/ECF system.

/s/ Kiman Kaur

Dated: April 23, 2024